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October 11, 1995

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FCC MAIL ROOM

VIA OVERNIGHT COURIER

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Telephone Number Portability (CC
Docket No. 95-116 RM 8535)


Dear Mr. Caton:

Pursuant to 47 C.F.R. 1.419, enclosed please find the original and nine copies of the Reply Comments of Time Warner Telecommunications for filing in the above-referenced proceeding.

I have also sent two copies to the Policy and Program Planning Division of the Common Carrier Bureau, and one copy to the International Transcription Services, Inc., pursuant to Telephone Number Portability, Notice of Proposed Rulemaking, FCC 95-284 at ¶ 83 (rel. July 13, 1995), and courtesy copies to each party that filed comments in the initial round.

Please call if you have any questions.

Sincerely,


Arthur W. Bresnahan
Attorney for Time Warner
Telecommunications

cc: Service List

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
TELEPHONE NUMBER)
PORTABILITY)

CC Docket No. 95-116
RM 8535

RECEIVED

OCT 12 1995

Reply Comments of

FCC MAIL ROOM

TIME WARNER TELECOMMUNICATIONS

Time Warner Telecommunications ("TWT") -- a new wireless telecommunications services provider -- is providing competitive exchange and exchange access services via resale. Similar to its affiliated company Time Warner Communications (a landline competitive local exchange carrier)¹, TWT urges the Commission to adopt strong number portability requirements in order to promote competition, innovation and the public interest.

I. Introduction

TWT currently provides competitive exchange and exchange access services via cellular resale in Rochester, New York, where consumers have been benefiting from TWT's entry into the market through competitively-priced, inno-

¹ See Comments of Time Warner Communications.

vative offerings. As a result of its efforts, TWT has had tremendous success in attracting new subscribers and other wireless carriers have responded with service offerings further benefiting consumers.

However, TWT does not want to stop here and intends to take its services to a higher plateau. TWT plans to compete against landline and wireless exchange carriers in many of the areas served by Time Warner's cable systems via wireless resale. Together with other Time Warner affiliates, TWT plans to bring consumers innovative service combinations based on intelligent-network, multimedia and integrated landline/wireless capabilities. Number portability will be an important factor in the ability of consumers to take advantage of these offerings from new carriers and the ability of Time Warner to be an effective competitor in local exchange services.²

² "The Commission has previously determined that, with regard to cellular resale, 'a transferable NXX scheme . . . would serve the public interest.'" Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services, Second Notice of Proposed Rulemaking, FCC 95-149, at ¶ 94 (rel. April 20, 1995) ("CMRS Interconnection Second NPRM") (quoting Amendment of Part 22 of the Commission's Rules Relative to the Domestic Public Cellular Radio Service, 59 Rad. Reg. 2d 209, 212 (1985)).

II. To Ensure Full Competition in Local Telecommunications Services, Customers of All Providers of Local Exchange Services Must Be Allowed to Transfer Their Numbers to a New CMRS Carrier

A. Landline to Wireless Portability. The declining cost characteristics of the CMRS marketplace coupled with increasing competition from wireless carriers (resellers and eventually additional spectrum licensees) continues to lower the price of wireless services. Through wireless exchange carriers, consumers will benefit from not only a choice among different service providers but also a choice among different technologies for local exchange and exchange access services -- landline, wireless and integrated landline/wireless.³

The Commission should encourage local exchange competition on a technology-neutral basis.⁴ Customers of a provider of local exchange services must be able to port their numbers to any other carrier -- whether that carrier

³ See Telephone Number Portability, FCC 95-284 at ¶ 24, CC Docket No. 95-116 (rel. July 13, 1995) ("Notice") (recognizing possibility of future CMRS competition with landline LECs).

⁴ See Comments of the Ad Hoc Coalition of Competitive Carriers at 13; Comments of the Citizens Utility Company at 9 (minimum national number portability standards should support all industry segments, including wireless).

offers service on a landline basis or through wireless technology (in whole or part).⁵

The New York Public Service Commission recently recognized both the importance and likely technical feasibility of number portability from landline local exchange carriers to wireless carriers by ordering a trial of "true" (data-based) number portability that includes cellular carriers in Manhattan and Rochester.⁶

The Cellular Telecommunications Industry Association points out that wireless-landline number portability is crucial if wireless carriers are to be a competitive force in the local exchange and exchange access markets.⁷ Additionally, the costs of landline to wireless number portability are similar to those of landline to landline number

⁵ The General Services Administration expressed its frustration as a customer unable to port its numbers from landline to wireless. See Comments of the General Services Administration at 5.

⁶ Proceeding on Motion of the Commission to Examine Issues Related to the Continuing Provision of Universal Service and to Develop a Framework for the Transition to Competition in the Local Exchange Market; Order Authorizing Trials of Service Provider Number Portability in Manhattan and Rochester, Case 94-C-0095, at 2 (N.Y.P.S.C. Sept. 25, 1995).

⁷ Comments of the Cellular Telecommunications Industry Association at 8-9. See also Comments of America's Carriers Telecommunications Association at 4; Comments of the Ad Hoc Coalition of Competitive Carriers at 13.

portability and should be recovered in the same way.⁸ While TWT believes that it will be able to compete even in the absence of number portability, the public will not benefit as quickly from the offerings of TWT and TWComm without number portability.

As wireless service becomes increasingly substitutable for landline local service, the demand for portability from landline to wireless carriers is becoming more and more similar to the demand for portability among landline carriers. Just as for competitive landline carriers, the transaction costs caused by a lack of number portability to and among wireless carriers will give an inefficient advantage to the incumbent provider of exchange services and dampen price and service quality competition.⁹ A customer who finds that a particular provider's offering best suits its needs might nonetheless avoid switching providers in order to retain its telephone number.

⁸ See Comments of Pacific Bell at 9; Comments of America's Carriers Telecommunications Association at 14; Comments of PCS Primeco at 3.

⁹ See Comments of Omnipoint at 3; Comments of the National Wireless Resellers Association at 1-2. As U. S. Airwaves suggests, number portability will allow consumers to base their decisions on their own needs rather than their old phone number. Comments of U. S. Airwaves at 3. This is especially important in light of the advent of PCS.

B. Wireless to Wireless Portability. Wireless licensees should not be allowed to control the numbers of their customers and thus inhibit the competition that would occur with number portability; such control is contrary to the public interest for any incumbent exchange carrier, landline or cellular.¹⁰ Much of the competition that the Commission expects from PCS carriers as well as other CMRS carriers, including resellers, depends on number portability. For example, Pacific Bell (a PCS licensee) correctly stated that "[t]o the extent that wireless service providers offer the same type of basic, local exchange service as wireline carriers, we expect that the demand for service provider portability will be similar."¹¹

All carriers, including cellular carriers, will face technical issues when implementing number portability. There is no reason to expect that cellular carriers will be less able to resolve the technical issues than their

¹⁰ The Commission should take the earliest possible opportunity to resolve CMRS number portability issues, whether in this proceeding or in the CMRS Interconnection proceeding. The Commission has not yet determined whether to address CMRS number portability issues in this proceeding or in the CMRS Interconnection proceeding. See Telephone Number Portability, CC Docket 95-116, at ¶ 24 n.31 (rel. July 13, 1995) ("Notice"); CMRS Interconnection Second NPRM at ¶ 94 n.192.

¹¹ Comments of Pacific Bell at 8.

landline counterparts.¹² Indeed, cellular licensees already have experience in providing a type of number portability through roaming.¹³ As Pacific Bell observed, a requirement of ten digit call routing would place the same technical burden on all carriers regardless of the technology deployed by the other service provider.¹⁴

Finally, cellular licensees should be required to allow resellers to administer the numbers that are assigned to their end-user customers and to allow the numbers administered by switch-based resellers to reside in the resellers' switches.¹⁵ The Declaration of Alex D. Felker, Senior Vice President of TWT, demonstrates that there is no

¹² MCI, noting the importance of number portability for competition among wireless providers and between wireless and landline providers, correctly states that provider portability can and should proceed while technical solutions are worked out. See Comments of MCI at 3, 10.

¹³ See Notice at ¶ 4 n.3. See also Comments of Independent Telecommunications Network, Inc. at 17-18. As ITN points out, cellular roaming using the HLR/VLR architecture is conceptually similar to ITN's proposed number portability architecture.

¹⁴ Comments of Pacific Bell at 9. See also Comments of America's Carrier's Telecommunications Association at 14.

¹⁵ See Comments of Time Warner Telecommunications, CC Docket 94-54, at 17-18 (filed June 14, 1995).

technical problem in allowing a switch-based reseller such as TWT to control its own NPA-NXX blocks.¹⁶

III. Conclusion

Rather than providing inefficient advantages for incumbent local exchange carriers (landline or wireless), the Commission should require number portability and do so for wireless as well as landline carriers. A customer should be allowed to choose its carrier based on the technology (or technologies), offerings and prices that best meet its needs, without being deterred by the often substantial costs of changing phone numbers.

Respectfully submitted,



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ATTORNEYS FOR TIME WARNER
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October 12, 1995

¹⁶ Comments of Time Warner Telecommunications, CC Docket 94-54, Declaration of Alex D. Felker (copy attached hereto).

DECLARATION OF ALEX D. FELKER

I, Alex D. Felker, do hereby declare and state under penalty of perjury as follows:

1. I am the Senior Vice President of Time Warner Telecommunications ("TWT") where I am responsible for technology planning, network engineering, information support systems, and new product development.

2. TWT currently offers wireless telephony service as a cellular reseller in Rochester, New York. TWT's commitment to wireless technology involves bringing consumers integrated offerings of innovative landline, wireless and content-based services at competitive prices. Switch-based resale is an integral component of this plan.

3. Technical representatives of TWT, in consultation with cellular radio licensees and equipment manufacturers, have achieved a substantial degree of consensus on a network structure under which TWT could establish a technically feasible switch-based cellular resale operation. TWT understands that other switch-based resellers have engaged their own consultations with similar results.

4. The technical and business arrangements associated with implementing switch-based resale are no more expensive or administratively burdensome to the cellular radio licensees than their interconnection arrangements with wireline carriers or their roaming agreements with each other. In fact, having gained extensive experience with wireline interconnection and roaming over the years, the cellular carriers would find interconnecting with resellers' switches to be relatively simple.

5. The system design currently under consideration (Figure 1) is based entirely on standardized interfaces, facilities and protocols. Under this architecture, telephony routing responsibility would be placed on TWT, mobility management on TWT's AIN platform, and wireless access services on the cellular carrier's local cellular network.

6. TWT would independently obtain blocks of NPA-NXX codes from the local numbering administrator and TWT subscribers' telephone numbers would reside on the TWT switch. In effect, the underlying carrier would treat this group of subscribers as a special class of "roamers" on its cellular network.

7. When in service within the underlying cellular carrier's home market, TWT subscribers would register their current local serving location with the AIN mobility management platform automatically (this platform is technically known as the subscriber's Home Location Register (HLR)).

8. The local serving underlying cellular carrier's mobile switching center ("MSC") would route all TWT subscriber outgoing calls directly to TWT's switch over dedicated facilities.

9. When in service in foreign (i.e., roaming) markets, TWT subscribers' registration information would be delivered automatically via an IS 41 (an industry standard protocol for intersystem operations and signaling) network to TWT's AIN mobility management platform.

10. All incoming calls intended for TWT subscribers would be routed to the appropriate TWT switch. Incoming calls then would be routed by the TWT switch depending on the current state of the subscriber.

11. Calls originated on a foreign network would be routed to the PSTN by the foreign underlying carrier using the existing industry roamer clearinghouse process.

12. Routing from the PSTN is based on a translation of the NPA-NXX to the appropriate switch. This information would be documented in a Local Exchange Routing Guide (LERG) which is published monthly by Bellcore.

13. For calls to subscribers that were both in service on the local cellular carrier's system and already registered with the AIN mobility management platform, in response to a query from the TWT switch, the AIN mobility management platform would verify the status of the subscriber and would return one of the following:

- (1) A Temporary Local Directory Number (TLDN) for the current serving system. The TLDN is used by the TWT switch to route the call to the appropriate switch and is used by the serving MSC to match the incoming call to the appropriate subscriber;
- (2) A call-forwarded-to-number (the call-forwarded-to number is used for call forward -- immediate and Single Number Services);
- (3) Busy status;
- (4) No longer registered status; or
- (5) In those situations where paged subscribers do not answer (or the terminals do not respond to the page), the serving MSC would respond to the AIN mobility manager with the no answer condition. The AIN mobility manager would in turn return this information to the TWT switch, and either the incoming call would be redirected to the no answer

treatment (e.g., voice mail) or no action would be taken, in which case the serving switch would either time-out and give a no answer announcement or continues ringback.

14. For incoming calls to subscribers registered on a foreign roaming system, the above process generally would apply, but the call would be routed through the PSTN via the subscriber's Primary Interexchange Carrier (PIC) (the call is routed via the default carrier when no PIC is applicable). Billing information would be provided from foreign roaming carriers and interexchange carriers (if applicable).

15. For incoming calls to subscribers that are not registered, the TWT switch would route to either the call-forwarded-to number or provide no answer treatment (e.g., voice mail, continued ringback, or not answering message).

16. The call scenarios described above are limited solely to mobile subscribers. It is proposed, however, that provision be made to maintain subscriber records for TWT landline customers on the AIN platform, as well.

17. The configuration implications of the TWT plan include the following:

- For administration purposes, the subscribers appear in the TWT operational support environment
- TWT subscribers' phones are programmed with the home system identification (SID)
- The TWT customer service process interfaces to the TWT AIN mobility management platform for activation and profile management
- For routing purposes, TWT subscriber numbers appear on the TWT switch. The TWT switch routes directly to the appropriate location based on information for the AIN mobility management platform
- The various local serving MSCs interact directly with the AIN mobility management platform.
- The foreign roaming MSCs interact with the AIN mobility management platform in the same manner as they do for other cellular radio licensee's subscribers.

- The foreign roaming partner returns billing data to TWT via direct (intra-carrier) or clearinghouse (inter-carrier) processes.

18. The system as described would provide TWT with a number of important capabilities, including:

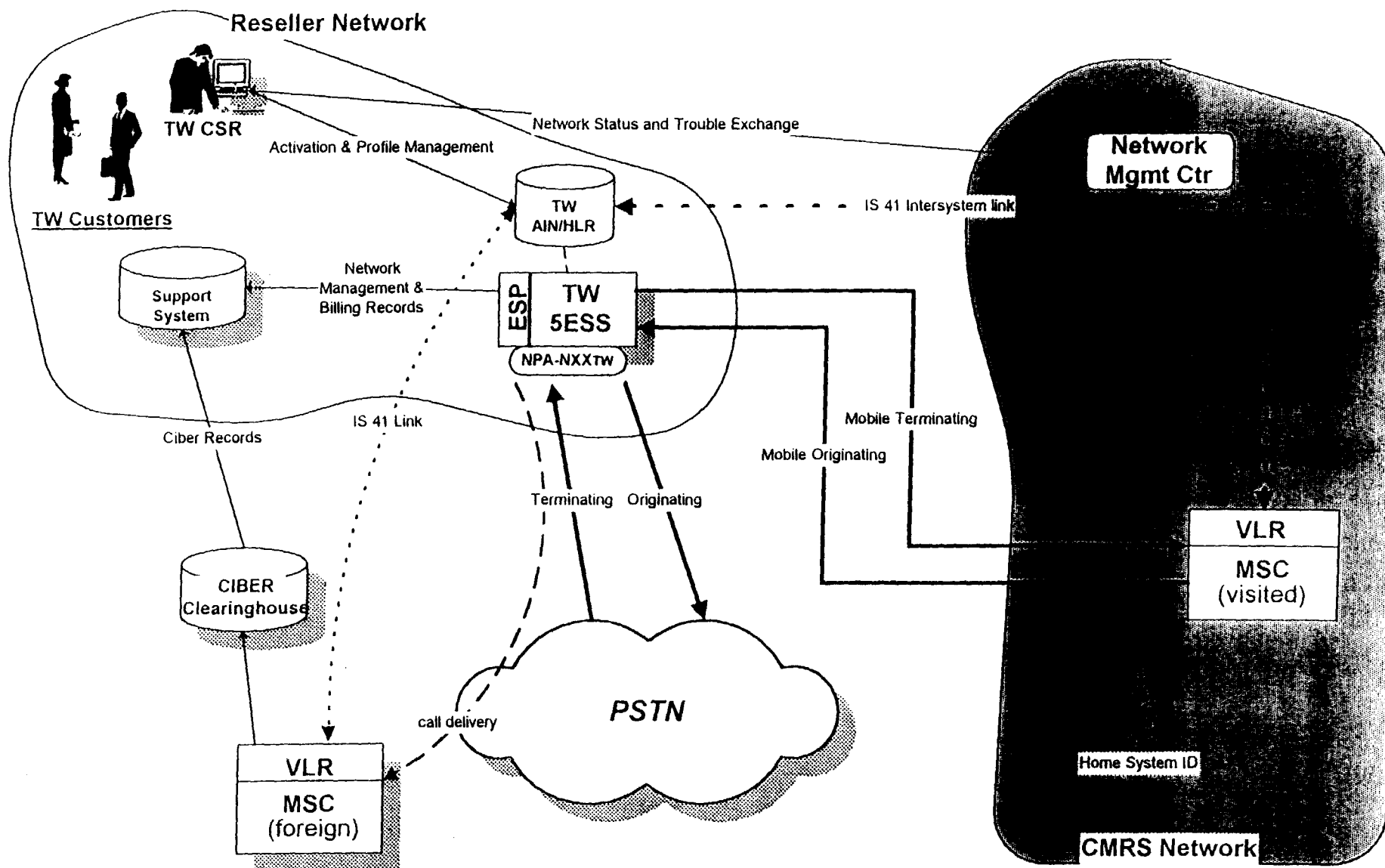
- Single number feature for all Time Warner local services (e.g., wireless and landline)
- Routing of all incoming and all local outgoing calls through the TWT switch, thereby
 - providing near-real time billing capability
 - taking advantage of unique interconnection arrangements between TWT and other carriers
 - minimizing forwarding to, busy, or no answered calls on the underlying carrier's network
- AIN functionality, including mobility management and other unique services which TWT may develop

19. I have read the foregoing "Comments Of Time Warner Telecommunications On Second Notice Of Proposed Rulemaking." With respect to statements made in the Comments, other than those of which official notice can be taken, the facts contained therein are true and correct to the best of my personal knowledge, information and belief.

14 June 1995
Date

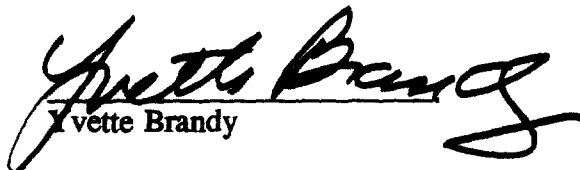
Alex D. Felker
Alex D. Felker

Figure 1 - Reseller Switch Network Design



CERTIFICATE OF SERVICE

I, Yvette Brandy, do hereby certify that on this 11th day of October, 1995, I have caused a copy of the foregoing **Reply Comments of Time Warner Telecommunications**, to be served via U.S. Mail (or overnight courier, where indicated) upon the persons listed on the attached service list.


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